



## IN THE 21ST JUDICIAL CIRCUIT COURT, ST. LOUIS COUNTY, MISSOURI

Judge or Division: JOSEPH L. WALSH III	Case Number: 19SL-CC02229
Plaintiff/Petitioner: HUSSAIN SYED ASHFAQ	Plaintiff's/Petitioner's Attorney/Address W BEVIS SCHOCK 7777 BONHOMME STE 1300 CLAYTON, MO 63105
Defendant/Respondent: FRONTIER AIR LINES, INC.	Court Address: ST LOUIS COUNTY COURT BUILDING 105 SOUTH CENTRAL AVENUE CLAYTON, MO 63105
Nature of Suit: CC Pers Injury-Other	(Date File Stamp)

## Summons in Civil Case

The State of Missouri to: FRONTIER AIR LINES, INC.

Alias:

SHERIFF OF COLE COUNTY  
PRENTICE HALL CORPORATION  
221 BOLIVAR ST.  
JEFFERSON CITY, MO 65101



ST. LOUIS COUNTY

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

**SPECIAL NEEDS:** If you have special needs addressed by the Americans With Disabilities Act, please notify the Office of the Circuit Clerk at 314-615-8029, FAX 314-615-8739, email at SLCADA@courts.mo.gov, or through Relay Missouri by dialing 711 or 800-735-2966, at least three business days in advance of the court proceeding.

06-JUN-2019  
Date



Clerk

Further Information:  
LG

## Sheriff's or Server's Return

**Note to serving officer:** Summons should be returned to the court within thirty days after the date of issue.

I certify that I have served the above summons by: (check one)

delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.  
 leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with \_\_\_\_\_ a person of the Defendant's/Respondent's family over the age of 15 years who permanently resides with the Defendant/Respondent.  
 (for service on a corporation) delivering a copy of the summons and a copy of the petition to \_\_\_\_\_

\_\_\_\_\_ (name) \_\_\_\_\_ (title).

other \_\_\_\_\_.

Served at \_\_\_\_\_ (address)

in \_\_\_\_\_ (County/City of St. Louis), MO, on \_\_\_\_\_ (date) at \_\_\_\_\_ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

**Must be sworn before a notary public if not served by an authorized officer:**

(Seal)

Subscribed and sworn to before me on \_\_\_\_\_ (date).

My commission expires: \_\_\_\_\_

Date

Notary Public

## Sheriff's Fees, if applicable

Summons	\$ _____
Non Est	\$ _____
Sheriff's Deputy Salary	\$ _____
Supplemental Surcharge	\$ 10.00
Mileage	\$ _____ ( _____ miles @ \$._____ per mile)
<b>Total</b>	\$ _____

A copy of the summons and a copy of the petition must be served on **each** Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.

Twenty First Judicial Circuit

**NOTICE OF ALTERNATIVE DISPUTE RESOLUTION SERVICES**

**Purpose of Notice**

As a party to a lawsuit in this court, you have the right to have a judge or jury decide your case. However, most lawsuits are settled by the parties before a trial takes place. This is often true even when the parties initially believe that settlement is not possible. A settlement reduces the expense and inconvenience of litigation. It also eliminates any uncertainty about the results of a trial.

Alternative dispute resolution services and procedures are available that may help the parties settle their lawsuit faster and at less cost. Often such services are most effective in reducing costs if used early in the course of a lawsuit. Your attorney can aid you in deciding whether and when such services would be helpful in your case.

**Your Rights and Obligations in Court Are Not Affected By This Notice**

You may decide to use an alternative dispute resolution procedure if the other parties to your case agree to do so. In some circumstances, a judge of this court may refer your case to an alternative dispute resolution procedure described below. These procedures are not a substitute for the services of a lawyer and consultation with a lawyer is recommended. Because you are a party to a lawsuit, you have obligations and deadlines which must be followed whether you use an alternative dispute resolution procedure or not. **IF YOU HAVE BEEN SERVED WITH A PETITION, YOU MUST FILE A RESPONSE ON TIME TO AVOID THE RISK OF DEFAULT JUDGMENT, WHETHER OR NOT YOU CHOOSE TO PURSUE AN ALTERNATIVE DISPUTE RESOLUTION PROCEDURE.**

**Alternative Dispute Resolution Procedures**

There are several procedures designed to help parties settle lawsuits. Most of these procedures involve the services of a neutral third party, often referred to as the "neutral," who is trained in dispute resolution and is not partial to any party. The services are provided by individuals and organizations who may charge a fee for this help. Some of the recognized alternative dispute resolutions procedures are:

**(1) Advisory Arbitration:** A procedure in which a neutral person or persons (typically one person or a panel of three persons) hears both sides and decides the case. The arbitrator's decision is not binding and simply serves to guide the parties in trying to settle their lawsuit. An arbitration is typically less formal than a trial, is usually shorter, and may be conducted in a private setting at a time mutually agreeable to the parties. The parties, by agreement, may select the arbitrator(s) and determine the rules under which the arbitration will be conducted.

**(2) Mediation:** A process in which a neutral third party facilitates communication between the parties to promote settlement. An effective mediator may offer solutions that have not been considered by the parties or their lawyers. A mediator may not impose his or her own judgment on the issues for that of the parties.

**(3) Early Neutral Evaluation (“ENE”):** A process designed to bring the parties to the litigation and their counsel together in the early pretrial period to present case summaries before and receive a non-binding assessment from an experienced neutral evaluator. The objective is to promote early and meaningful communication concerning disputes, enabling parties to plan their cases effectively and assess realistically the relative strengths and weaknesses of their positions. While this confidential environment provides an opportunity to negotiate a resolution, immediate settlement is not the primary purpose of this process.

**(4) Mini-Trial:** A process in which each party and their counsel present their case before a selected representative for each party and a neutral third party, to define the issues and develop a basis for realistic settlement negotiations. The neutral third party may issue an advisory opinion regarding the merits of the case. The advisory opinion is not binding.

**(5) Summary Jury Trial:** A summary jury trial is a non binding, informal settlement process in which jurors hear abbreviated case presentations. A judge or neutral presides over the hearing, but there are no witnesses and the rules of evidence are relaxed. After the “trial”, the jurors retire to deliberate and then deliver an advisory verdict. The verdict then becomes the starting point for settlement negotiations among the parties.

### **Selecting an Alternative Dispute Resolution Procedure and a Neutral**

If the parties agree to use an alternative dispute resolution procedure, they must decide what type of procedure to use and the identity of the neutral. As a public service, the St. Louis County Circuit Clerk maintains a list of persons who are available to serve as neutrals. The list contains the names of individuals who have met qualifications established by the Missouri Supreme Court and have asked to be on the list. The Circuit Clerk also has Neutral Qualifications Forms on file. These forms have been submitted by the neutrals on the list and provide information on their background and expertise. They also indicate the types of alternative dispute resolution services each neutral provides.

A copy of the list may be obtained by request in person and in writing to: Circuit Clerk, Office of Dispute Resolution Services, 105 South Central Ave., 5th Floor, Clayton, Missouri 63105. The Neutral Qualifications Forms will also be made available for inspection upon request to the Circuit Clerk.

The List and Neutral Qualification Forms are provided only as a convenience to the parties in selecting a neutral. The court cannot advise you on legal matters and can only provide you with the List and Forms. You should ask your lawyer for further information.

CCADM73

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

ASHFAQ HUSSAIN SYED, *et al.* )  
Plaintiffs, ) Case No.: 19SL-CC02229  
v. ) Division: 4  
FRONTIER AIR LINES, INC., )  
Defendant. )

**PLAINTIFFS' MOTION FOR ORDER TO CLERK  
TO CORRECT ERROR IN PLAINTIFF SYED'S NAME  
IN CASE CAPTION**

Come now Plaintiffs, by counsel W. Bevis Schock, and move for an order to the clerk to correct an error in Plaintiff' Ashfaq Hussain Syed's name in the case caption. When the clerk set up the case the clerk apparently thought Plaintiff Ashfaq Hussain Syed's middle name was his last name. In fact, his correct last name is "Syed".

WHEREFORE, Plaintiffs pray the court to order the clerk correct the case caption to reflect that Plaintiff's name is Ashfaq Hussain Syed, and that his last name is Syed.

So Ordered,

---

Judge

Date \_\_\_\_\_

IN THE CIRCUIT COURT FOR THE COUNTY OF ST. LOUIS  
STATE OF MISSOURI

ASHFAQ HUSSAIN SYED, *et al.* )  
Plaintiffs, )  
v. ) Case No.: 19SL-CC02229  
FRONTIER AIR LINES, INC., ) Division: 4  
Defendant. )

**PETITION FOR APPOINTMENT AS NEXT FRIEND**

Comes now Petitioner Ashfaq Hussain Syed, by counsel W. Bevis Schock, and moves under Rule 52.02 for his appointment as Next Friend of A.M.S., and N.G.S., collectively ("the children"). In support whereof Petitioner states:

1. A.M.S. is an infant child, Date of Birth: December 16, 2016, currently age 2.
2. N.G.S. is an infant child, Date of Birth: December 16, 2016, currently age 2.
3. Petitioner Ashfaq Hussain Syed is the natural father of the children.
4. Plaintiff Shelly Branch is the natural mother of the children.
5. The family resides together at:

5 Country Club Dr.  
Fulton, MO, 65251

Callaway County

6. Shelly Branch and Ashfaq Hussain Syed are adult Plaintiffs in this law suit.
7. The allegations in the suit relate to an event in August 2018 when the family was unlawfully removed from a flight from Las Vegas, and unlawfully imprisoned on a jetway.

8. Pursuant to Rule 52.02 the children may only proceed in this matter upon appointment of a Next Friend.

WHEREFORE, Petitioner Ashfaq Hussain Syed moves to be appointed Next Friend of A.M.S. and N.G.S. for purposes of this suit.

**CONSENT OF ASHFAQ HUSSAIN SYED**

9. My name is Ashfaq Hussain Syed. I am an adult and capable of making this affidavit.

10. I hereby consent to serve in this lawsuit as Next Friend of my daughters, A.M.S. and N.G.S.

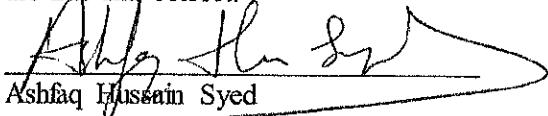
11. I will act in their best interest.

12. I will follow the requirements of Rule 52.02, including:

a. Upon any resolution of the matter in which the children are entitled to receive funds I will lawfully obtain court approval and/or obtain a bond,

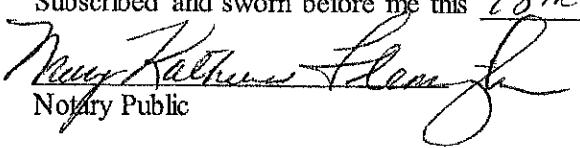
b. I will be responsible for court costs.

I hereby verify and affirm that I have read and understood this document. I declare under oath and under penalty of perjury that to the best of my knowledge all the statements in the document are true and correct.

  
Ashfaq Hussain Syed

State of Missouri )  
County of St. Louis ) ss

Subscribed and sworn before me this 18th of June, 2019.

  
Notary Public



Respectfully Submitted,

/s/ W. Bevis Schock  
W. Bevis Schock, MBE # 32551  
Attorney for Plaintiffs  
7777 Bonhomme Ave., Ste. 1300  
St. Louis, MO 63105  
wbschock@schocklaw.com  
Fax: 314-721-1698  
Voice: 314-726-2322

IN THE CIRCUIT COURT FOR THE COUNTY OF ST. LOUIS  
STATE OF MISSOURI

ASHFAQ HUSSAIN SYED, *et al.* )  
Plaintiffs, ) Case No.: 19SL-CC02229  
v. ) Division: 4  
FRONTIER AIR LINES, INC., )  
Defendant. )

**PLAINTIFFS' NOTICE OF FILING *PRO HAC VICE FEE*  
TO MISSOURI SUPREME COURT**

Come now Plaintiffs, by counsel W. Bevis Schock, and file receipt for *Pro Hac Vice* fee paid to Missouri Supreme Court for:

Thatcher A. Stone and William T. Woodrow

Respectfully Submitted,

/s/ W. Bevis Schock.  
W. Bevis Schock, 32551  
Attorney for Plaintiffs  
7777 Bonhomme Ave., Ste. 1300  
St. Louis, MO 63105  
wbschock@schocklaw.com  
Fax: 314-721-1698  
Voice: 314-726-2322

**CERTIFICATE OF SERVICE**

The undersigned certifies that on June 20, 2019 he served this document on:

All counsel of record

/s/ W. Bevis Schock.

The service method was: electronic filing.



**CLERK OF THE SUPREME COURT**

**STATE OF MISSOURI**

**POST OFFICE BOX 150**

BETSY AUBUCHON  
CLERK

**JEFFERSON CITY, MISSOURI**

**65102**

TELEPHONE  
(573) 751-4144

June 13, 2019

*This will hereby acknowledge receipt of \$820 as required by Rule 6.01(m) for Thatcher A. Stone and William T. Woodrow, appearing in Syed, et. al. v. Frontier Air Lines, Inc., Case No. 19SL-CC02229, before the Circuit Court of St. Louis County, State of Missouri.*

A handwritten signature in black ink that reads "Betsy AuBuchon".

Betsy AuBuchon, Clerk

**RECEIVED**

**JUN 17 2019**

W. BEVIS SCHOCK

IN THE CIRCUIT COURT FOR THE COUNTY OF ST. LOUIS  
STATE OF MISSOURI

ASHFAQ HUSSAIN SYED, *et al.* )  
Plaintiffs, ) Case No.: 19SL-CC02229  
v. ) Division: 4  
FRONTIER AIR LINES, INC., )  
Defendant. )

**APPLICATION FOR ADMISSION OF WILLIAM T. WOODROW FOR PLAINTIFFS  
*PRO HAC VICE***

Come now Plaintiffs, by counsel W. Bevis Schock, and move the court to grant the entry of appearance of William T. Woodrow for Plaintiffs, *pro hac vice* pursuant to Rule 9.03. In support whereof Plaintiffs state:

1. W. Bevis Schock, a licensed attorney in the State of Missouri, filed this case.
2. Plaintiffs now seek the admission of William T. Woodrow as additional counsel for Plaintiffs.
3. Mr. Woodrow is a member in good standing of the Bar of New York State.
4. He is a member of:

Stone & Woodrow LLP  
250 West Main St. Suite 201  
Charlottesville, VA 22902  
855-275-7378

5. No member of that firm is under suspension or disbarred by the highest court of any state or territory of the United States or the District of Columbia.
6. His attached affidavit, Exhibit A, lists every court of which he is a member of the bar.

7. As stated in that affidavit, Mr. Stone agrees to comply with Rules of Professional Conduct as set forth in Rule 4 and to become subject to discipline by the courts of this state.
8. Plaintiffs attach Exhibit A, a receipt from the Missouri Supreme Court for the \$410.00 fee.

WHEREFORE, Plaintiffs prays the court to admit William T. Woodrow, *pro hac vice*, to represent Plaintiffs in this matter.

Respectfully Submitted,

/s/ W. Bevis Schock.  
W. Bevis Schock, MBE # 32551  
Attorney for Plaintiffs  
7777 Bonhomme Ave., Ste. 1300  
St. Louis, MO 63105  
wbschock@schocklaw.com  
Fax: 314-721-1698  
Voice: 314-726-2322

So Ordered,

---

Judge

Date \_\_\_\_\_

IN THE CIRCUIT COURT FOR THE COUNTY OF ST. LOUIS  
STATE OF MISSOURI

ASHFAQ HUSSAIN SYED, *et al.*

Plaintiffs,

v.

FRONTIER AIR LINES, INC.,

Defendant.

) Case No.: 19SL-CC02229

) Division: 4

**AFFIDAVIT OF WILLIAM T. WOODROW  
IN SUPPORT OF ADMISSION *PRO HAC VICE* FOR PLAINTIFFS**

1. My name is William T. Woodrow.
2. I am an adult and capable of making this affidavit.
3. I am a licensed attorney in the state of Virginia, Bar No. 88122
4. I seek admission in this cause, *pro hac vice*, pursuant to Rule 9.03.
5. W. Bevis Schock is a licensed Missouri attorney and he is associate counsel in this matter.
6. W. Bevis Schock filed this case and has thus entered his appearance, and he will sign all pleadings, briefs, and other filed or served documents, and he will be present at all hearings unless excused by the judge or presiding officer.
7. I am a member of:

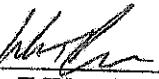
Stone & Woodrow LLP  
250 West Main St. Suite 201  
Charlottesville, VA 22902  
855-275-7378

8. No member of my firm is under suspension or disbarred by the highest court of any state or territory of the United States or the District of Columbia.
9. I was admitted to the following courts on the following dates:

1.	Supreme Court of Virginia	2014
2.	Eastern District of Virginia	2014
3.	Western District of Virginia	2014

10. I agree to comply with the Rules of Professional Conduct as set forth in Rule 4, and to become subject to discipline by the courts of this state.

I hereby verify and affirm that I have read and understood this document. I declare under oath and under penalty of perjury that to the best of my knowledge all the statements in the document are true and correct.

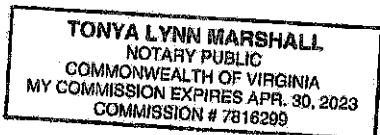
  
\_\_\_\_\_  
William T Woodrow

State of Virginia      )  
                            )  
                            ) ss  
County of Albemarle    )

On this 18<sup>th</sup> day of June 2019 before me personally appeared William T. Woodrow to me known to be the person or persons described herein. The signatory(s) executed the foregoing instrument, and signed it before me, and acknowledged that he, she or they executed the same as his, her or their free act and deed.

IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed my official seal in the state aforesaid, the day and year first above written.

  
\_\_\_\_\_  
Notary Public





**CLERK OF THE SUPREME COURT**

**STATE OF MISSOURI**

**POST OFFICE BOX 150**

**JEFFERSON CITY, MISSOURI**

**65102**

BETSY AUBUCHON  
CLERK

TELEPHONE  
(573) 751-4144

June 13, 2019

*This will hereby acknowledge receipt of \$820 as required by Rule 6.01(m) for Thatcher A. Stone and William T. Woodrow, appearing in Syed, et. al. v. Frontier Air Lines, Inc., Case No. 19SL-CC02229, before the Circuit Court of St. Louis County, State of Missouri.*

A handwritten signature in black ink that reads "Betsy AuBuchon".

Betsy AuBuchon, Clerk

**RECEIVED**

**JUN 17 2019**

W. BEVIS SCHOCK

IN THE CIRCUIT COURT FOR THE COUNTY OF ST. LOUIS  
STATE OF MISSOURI

ASHFAQ HUSSAIN SYED, *et al.* )  
Plaintiffs, ) Case No.: 19SL-CC02229  
v. ) Division: 4  
FRONTIER AIR LINES, INC., )  
Defendant. )

**APPLICATION FOR ADMISSION OF THATCHER A STONE FOR PLAINTIFFS  
*PRO HAC VICE***

Come now Plaintiffs, by counsel W. Bevis Schock, and move the court to grant the entry of appearance of Thatcher A. Stone for Plaintiffs, *pro hac vice* pursuant to Rule 9.03. In support whereof Plaintiffs state:

1. W. Bevis Schock, a licensed attorney in the State of Missouri, filed this case.
2. Plaintiff now seek the admission of Thatcher A. Stone as additional counsel for Plaintiffs.
3. Mr. Stone is a member in good standing of the Bar of New York State.
4. He is a member of:

Stone & Woodrow LLP  
250 West Main St. Suite 201  
Charlottesville, VA 22902  
855-275-7378

5. No member of that firm is under suspension or disbarred by the highest court of any state or territory of the United States or the District of Columbia.
6. His attached affidavit, Exhibit A, lists every court of which he is a member of the bar.
7. As stated in that affidavit, Mr. Stone agrees to comply with Rules of Professional Conduct as set forth in Rule 4 and to become subject to discipline by the courts of this state.

8. Plaintiffs attach Exhibit A, a receipt from the Missouri Supreme Court for the \$410.00 fee.

WHEREFORE, Plaintiffs prays the court to admit Thatcher A. Stone, *pro hac vice*, to represent Plaintiffs in this matter.

Respectfully Submitted,

/s/ W. Bevis Schock.  
W. Bevis Schock, MBE # 32551  
Attorney for Plaintiffs  
7777 Bonhomme Ave., Ste. 1300  
St. Louis, MO 63105  
wbschock@schocklaw.com  
Fax: 314-721-1698  
Voice: 314-726-2322

So Ordered,

---

Judge

Date \_\_\_\_\_

IN THE CIRCUIT COURT FOR THE COUNTY OF ST. LOUIS  
-STATE OF MISSOURI

ASHFAQ HUSSAIN SYED, *et al.*

Plaintiffs,

v.

FRONTIER AIR LINES, INC.,

Defendant.

) Case No.: 19SL-CC02229

) Division: 4

**AFFIDAVIT OF THATCHER A. STONE  
IN SUPPORT OF ADMISSION *PRO HAC VICE* FOR PLAINTIFFS**

1. My name is Thatcher A. Stone.
2. I am an adult and capable of making this affidavit.
3. I am a licensed attorney in the following states:
  - a. New York State, Bar No. 1848159
4. I seek admission in this cause, *pro hac vice*, pursuant to Rule 9.03.
5. W. Bevis Schock is a licensed Missouri attorney and he is associate counsel in this matter.
6. W. Bevis Schock filed this case and has thus entered his appearance, and he will sign all pleadings, briefs, and other filed or served documents, and he will be present at all hearings unless excused by the judge or presiding officer.
7. I am a member of:

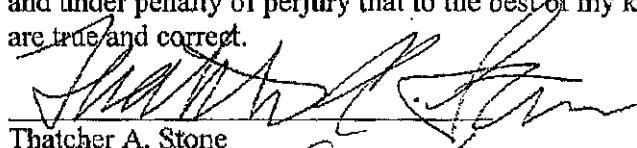
Stone & Woodrow LLP  
250 West Main St. Suite 201  
Charlottesville, VA 22902  
855-275-7378
8. No member of my firm is under suspension or disbarred by the highest court of any state or territory of the United States or the District of Columbia.

9. I was admitted to the following courts on the following dates:

1.	New York Court of Appeals	March 1983
2.	U.S. Court of Appeals for the Second Circuit	Sept. 5, 2013
3.	U.S. Supreme Court	January 7, 2013
4.	U.S. Court of Appeals for the Ninth Circuit	2009

10. I agree to comply with the Rules of Professional Conduct as set forth in Rule 4, and to become subject to discipline by the courts of this state.

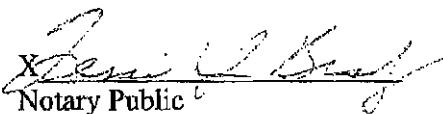
I hereby verify and affirm that I have read and understood this document. I declare under oath and under penalty of perjury that to the best of my knowledge all the statements in the document are true and correct.

  
Thatcher A. Stone

  
State of Virginia )  
                      )  
                      ss  
County of Albemarle )

On this 12<sup>th</sup> day of June, 2019 before me personally appeared Thatcher A. Stone, to me known to be the person or persons described herein. The signatory(s) executed the foregoing instrument, and signed it before me, and acknowledged that he, she or they executed the same as his, her or their free act and deed.

IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed my official seal in the state aforesaid, the day and year first above written.

  
X Tessie L. Bishop  
Notary Public





**CLERK OF THE SUPREME COURT**

**STATE OF MISSOURI**

**POST OFFICE BOX 150**

**JEFFERSON CITY, MISSOURI**

**65102**

BETSY AUBUCHON  
CLERK

TELEPHONE  
(573) 751-4144

June 13, 2019

*This will hereby acknowledge receipt of \$820 as required by Rule 6.01(m) for Thatcher A. Stone and William T. Woodrow, appearing in Syed, et. al. v. Frontier Air Lines, Inc., Case No. 19SL-CC02229, before the Circuit Court of St. Louis County, State of Missouri.*

A handwritten signature in black ink that reads "Betsy AuBuchon".

Betsy AuBuchon, Clerk

**RECEIVED**

**JUN 17 2019**

W. BEVIS SCHOCK

IN THE CIRCUIT COURT FOR THE COUNTY OF ST. LOUIS  
STATE OF MISSOURI

ASHFAQ HUSSAIN SYED, *et al.* )  
Plaintiffs, ) Case No.: 19SL-CC02229  
v. ) Division: 4  
FRONTIER AIR LINES, INC., )  
Defendant. )

**PLAINTIFFS' MOTION FOR CAUSE TO BE LITIGATED  
IN THE PRE-TRIAL PUBLIC RECORD  
WITH CHILDREN IDENTIFIED THROUGH INITIALS ONLY, AND  
FOR LEAVE FOR PLAINTIFF TO FILE THEIR FULL NAMES UNDER SEAL**

Come now Plaintiffs, by counsel W. Bevis Schock, and move the court to allow case to be litigated in the pre-trial public record with the children identified through initials only, and for leave for Plaintiffs to file the children's full names under seal. In support whereof, Plaintiffs state:

1. This is a case by the four members of Plaintiff's family, a father, a mother and their two infant children, against Frontier Airlines for improperly removing Plaintiffs from an airplane.
2. Plaintiff A.M.S. is an infant child, Date of Birth: December 16, 2016.
3. Plaintiff N.G.S. is an infant child, Date of Birth: December 16, 2016.

Because the children are less than three years old it would be improper for their names to be in the public record.

Plaintiffs further ask for leave for the children's full names to be filed under seal.

WHEREFORE, Plaintiffs pray the court to order that this case shall be litigated in the pre-trial public record with the children identified through initials only and for leave to Plaintiff to file their full names under seal.

Respectfully Submitted,

/s/ W. Bevis Schock  
W. Bevis Schock, MBE # 32551  
Attorney for Plaintiffs  
7777 Bonhomme Ave., Ste. 1300  
St. Louis, MO 63105  
wbschock@schocklaw.com  
Fax: 314-721-1698  
Voice: 314-726-2322

So Ordered,

---

Judge

Date \_\_\_\_\_

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

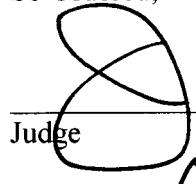
ASHFAQ HUSSAIN SYED, *et al.* )  
Plaintiffs, )  
v. ) Case No.: 19SL-CC02229  
FRONTIER AIR LINES, INC., ) Division: 4  
Defendant. )

**PLAINTIFFS' MOTION FOR ORDER TO CLERK  
TO CORRECT ERROR IN PLAINTIFF SYED'S NAME  
IN CASE CAPTION**

Come now Plaintiffs, by counsel W. Bevis Schock, and move for an order to the clerk to correct an error in Plaintiff Ashfaq Hussain Syed's name in the case caption. When the clerk set up the case the clerk apparently thought Plaintiff Ashfaq Hussain Syed's middle name was his last name. In fact, his correct last name is "Syed".

WHEREFORE, Plaintiffs pray the court to order the clerk correct the case caption to reflect that Plaintiff's name is Ashfaq Hussain Syed, and that his last name is Syed.

So Ordered,

  
\_\_\_\_\_  
Judge \_\_\_\_\_  
Date 6/20/19



## IN THE 21ST JUDICIAL CIRCUIT COURT, ST. LOUIS COUNTY, MISSOURI

Judge or Division: JOSEPH L. WALSH III	Case Number: 19SL-CC02229	RECEIVED
Plaintiff/Petitioner: HUSSAIN SYED ASHFAQ	Plaintiff's/Petitioner's Attorney/Address W BEVIS SCHOCK 7777 BONHOMME STE 1300 CLAYTON, MO 63105	JUN 12 2019
Defendant/Respondent: FRONTIER AIR LINES, INC.	Court Address: ST LOUIS COUNTY COURT BUILDING 105 SOUTH CENTRAL AVENUE CLAYTON, MO 63105	COLE COUNTY SHERIFF'S OFFICE
Nature of Suit: CC Pers Injury-Other		FILED (Date stamp)

## Summons in Civil Case

The State of Missouri to: FRONTIER AIR LINES, INC. Alias: SHERIFF OF COLE COUNTY PRENTICE HALL CORPORATION 221 BOLIVAR ST. JEFFERSON CITY, MO 65101	JUN 26 2019
<p><b>COURT SEAL OF</b>    <b>ST. LOUIS COUNTY</b></p> <p>You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.</p> <p><b>SPECIAL NEEDS:</b> If you have special needs addressed by the Americans With Disabilities Act, please notify the Office of the Circuit Clerk at 314-615-8029, FAX 314-615-8739, email at SLCADA@courts.mo.gov, or through Relay Missouri by dialing 711 or 800-735-2966, at least three business days in advance of the court proceeding.</p> <p><u>06-JUN-2019</u>  Date</p> <p><i>Joan M. Gilmer</i>  Clerk</p>	
<p>Further Information: LG</p> <p><b>Sheriff's or Server's Return</b></p> <p><b>Note to serving officer:</b> Summons should be returned to the court within thirty days after the date of issue.</p> <p>I certify that I have served the above summons by: (check one)</p> <p><input type="checkbox"/> delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.</p> <p><input type="checkbox"/> leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with _____ a person of the Defendant's/Respondent's family over the age of 15 years who permanently resides with the Defendant/Respondent.</p> <p><input checked="" type="checkbox"/> (for service on a corporation) delivering a copy of the summons and a copy of the petition to  <u>Prentice - Hall Corp., S.L.</u> (name) <u>Designee</u> (title).</p> <p><input type="checkbox"/> other _____.</p> <p>Served at <u>350 E. High</u> (address)  in <u>CoCo</u> (County/City of St. Louis), MO, on <u>06-13-19</u> (date) at <u>800 AM</u> (time).</p> <p><u>Sheriff John P Wheeler</u> By <u>Sgt. Cune whay</u>  Printed Name of Sheriff or Server Signature of Sheriff or Server</p> <p>Must be sworn before a notary public if not served by an authorized officer:</p> <p>(Seal) Subscribed and sworn to before me on _____ (date).</p> <p>My commission expires: _____ Date _____ Notary Public</p>	

<b>Sheriff's Fees, if applicable</b>	
Summons	\$ _____
Non Est	\$ _____
Sheriff's Deputy Salary	\$ _____
Supplemental Surcharge	\$ <u>10.00</u> ( _____ miles @ \$. <u>      </u> per mile)
Mileage	\$ _____
Total	\$ _____
A copy of the summons and a copy of the petition must be served on each Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.	

5275  
5275

In the  
**CIRCUIT COURT**  
of St. Louis County, Missouri



For File Stamp Only

FILED IN DIV. 17

Syed  
Plaintiff(s)

vs.

Frontier Airlines  
Defendant(s)

6/26/19  
Date  
19SL-CC012229  
Case Number  
17  
Division

JUN 26 2019

JOAN M. GILMER  
CIRCUIT CLERK, ST. LOUIS COUNTY

Order

The court being advised that Defendant consents, the court hereby grants the following Motions:

- ① Children to be identified in pleadings by initials only.
- ② ~~20~~ Motion of Ali Syed to serve as next friend of minor children.
- ③ Thatcher Stone and Will Woodrow are admitted ~~PHV~~ PHV.
- ④ Clerk to correct error in case caption.

**SO ORDERED**

Judge

ENTERED:

6/26/19  
(Date)

Attorney

Bar No.

Address

Phone No.

Fax No.

Attorney

Bar No.

Address

Phone No.

Fax No.

IN THE CIRCUIT COURT FOR THE COUNTY OF ST. LOUIS  
STATE OF MISSOURI

ASHFAQ HUSSAIN SYED, *et al.*

Plaintiffs,

v.

FRONTIER AIR LINES, INC.,

Defendant.

) Case No.: 19SL-CC02229

) Division: 4

SO ORDERED

7/2/19

Judge

Division 17

**PETITION FOR APPOINTMENT AS NEXT FRIEND**

Comes now Petitioner Ashfaq Hussain Syed, by counsel W. Bevis Schock, and moves under Rule 52.02 for his appointment as Next Friend of A.M.S., and N.G.S., collectively ("the children"). In support whereof Petitioner states:

1. A.M.S. is an infant child, Date of Birth: December 16, 2016, currently age 2.
2. N.G.S. is an infant child, Date of Birth: December 16, 2016, currently age 2.
3. Petitioner Ashfaq Hussain Syed is the natural father of the children.
4. Plaintiff Shelly Branch is the natural mother of the children.
5. The family resides together at:

5 Country Club Dr.  
Fulton, MO, 65251

Callaway County

6. Shelly Branch and Ashfaq Hussain Syed are adult Plaintiffs in this law suit.
7. The allegations in the suit relate to an event in August 2018 when the family was unlawfully removed from a flight from Las Vegas, and unlawfully imprisoned on a jetway.

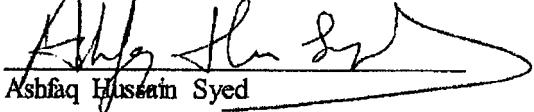
8. Pursuant to Rule 52.02 the children may only proceed in this matter upon appointment of a Next Friend.

WHEREFORE, Petitioner Ashfaq Hussain Syed moves to be appointed Next Friend of A.M.S. and N.G.S. for purposes of this suit.

**CONSENT OF ASHFAQ HUSSAIN SYED**

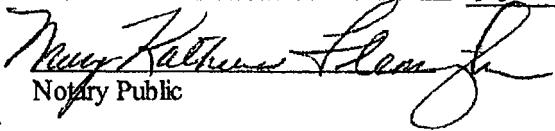
9. My name is Ashfaq Hussain Syed. I am an adult and capable of making this affidavit.
10. I hereby consent to serve in this lawsuit as Next Friend of my daughters, A.M.S. and N.G.S.
11. I will act in their best interest.
12. I will follow the requirements of Rule 52.02, including:
  - a. Upon any resolution of the matter in which the children are entitled to receive funds I will lawfully obtain court approval and/or obtain a bond,
  - b. I will be responsible for court costs.

I hereby verify and affirm that I have read and understood this document. I declare under oath and under penalty of perjury that to the best of my knowledge all the statements in the document are true and correct.

  
Ashfaq Hussain Syed

State of Missouri )  
                          )  
                          ss  
County of St. Louis )

Subscribed and sworn before me this 18th of June, 2019.

  
Mary Katherine Flemington  
Notary Public



Respectfully Submitted,

/s/ W. Bevis Schock  
W. Bevis Schock, MBE # 32551  
Attorney for Plaintiffs  
7777 Bonhomme Ave., Ste. 1300  
St. Louis, MO 63105  
wbschock@schocklaw.com  
Fax: 314-721-1698  
Voice: 314-726-2322

IN THE CIRCUIT COURT FOR THE COUNTY OF ST. LOUIS  
STATE OF MISSOURI

ASHFAQ HUSSAIN SYED, *et al.* )  
Plaintiffs, ) Case No.: 19SL-CC02229  
v. ) Division: 4 SO ORDERED  
FRONTIER AIR LINES, INC., )  
Defendant. )  
7/8/19

**APPLICATION FOR ADMISSION OF THATCHER A STONE FOR PLAINTIFFS  
*PRO HAC VICE***

Come now Plaintiffs, by counsel W. Bevis Schock, and move the court to grant the entry of appearance of Thatcher A. Stone for Plaintiffs, *pro hac vice* pursuant to Rule 9.03. In support whereof Plaintiffs state:

1. W. Bevis Schock, a licensed attorney in the State of Missouri, filed this case.
2. Plaintiff now seek the admission of Thatcher A. Stone as additional counsel for Plaintiffs.
3. Mr. Stone is a member in good standing of the Bar of New York State.
4. He is a member of:

Stone & Woodrow LLP  
250 West Main St. Suite 201  
Charlottesville, VA 22902  
855-275-7378

5. No member of that firm is under suspension or disbarred by the highest court of any state or territory of the United States or the District of Columbia.
6. His attached affidavit, Exhibit A, lists every court of which he is a member of the bar.
7. As stated in that affidavit, Mr. Stone agrees to comply with Rules of Professional Conduct as set forth in Rule 4 and to become subject to discipline by the courts of this state.

8. Plaintiffs attach Exhibit A, a receipt from the Missouri Supreme Court for the \$410.00 fee.

WHEREFORE, Plaintiffs prays the court to admit Thatcher A. Stone, *pro hac vice*, to represent Plaintiffs in this matter.

Respectfully Submitted,

/s/ W. Bevis Schock  
W. Bevis Schock, MBE # 32551  
Attorney for Plaintiffs  
7777 Bonhomme Ave., Ste. 1300  
St. Louis, MO 63105  
wbschock@schocklaw.com  
Fax: 314-721-1698  
Voice: 314-726-2322

So Ordered,

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Judge

Date \_\_\_\_\_

IN THE CIRCUIT COURT FOR THE COUNTY OF ST. LOUIS  
STATE OF MISSOURI

ASHFAQ HUSSAIN SYED, *et al.* )  
Plaintiffs, ) Case No.: 19SL-CC02229  
v. ) Division: 4 SO ORDERED  
FRONTIER AIR LINES, INC., )  
Defendant. )  
7/8/15  
Judge  
Division 17

**PLAINTIFFS' MOTION FOR CAUSE TO BE LITIGATED  
IN THE PRE-TRIAL PUBLIC RECORD  
WITH CHILDREN IDENTIFIED THROUGH INITIALS ONLY, AND  
FOR LEAVE FOR PLAINTIFF TO FILE THEIR FULL NAMES UNDER SEAL**

Come now Plaintiffs, by counsel W. Bevis Schock, and move the court to allow case to be litigated in the pre-trial public record with the children identified through initials only, and for leave for Plaintiffs to file the children's full names under seal. In support whereof, Plaintiffs state:

1. This is a case by the four members of Plaintiff's family, a father, a mother and their two infant children, against Frontier Airlines for improperly removing Plaintiffs from an airplane.
2. Plaintiff A.M.S. is an infant child, Date of Birth: December 16, 2016.
3. Plaintiff N.G.S. is an infant child, Date of Birth: December 16, 2016.

Because the children are less than three years old it would be improper for their names to be in the public record.

Plaintiffs further ask for leave for the children's full names to be filed under seal.

WHEREFORE, Plaintiffs pray the court to order that this case shall be litigated in the pre-trial public record with the children identified through initials only and for leave to Plaintiff to file their full names under seal.

Respectfully Submitted,

/s/ W. Bevis Schock .  
W. Bevis Schock, MBE # 32551  
Attorney for Plaintiffs  
7777 Bonhomme Ave., Ste. 1300  
St. Louis, MO 63105  
wbschock@schocklaw.com  
Fax: 314-721-1698  
Voice: 314-726-2322

So Ordered,

---

Judge

Date \_\_\_\_\_

IN THE CIRCUIT COURT FOR THE COUNTY OF ST. LOUIS  
STATE OF MISSOURI

ASHFAQ HUSSAIN SYED, *et al.* )  
Plaintiffs, ) Case No.: 19SL-CC02229  
v. ) Division: 4 *SO ORDERED*  
FRONTIER AIR LINES, INC., )  
Defendant. )  
7/8/19  
Judge  
Division 17

**APPLICATION FOR ADMISSION OF WILLIAM T. WOODROW FOR PLAINTIFFS  
*PRO HAC VICE***

Come now Plaintiffs, by counsel W. Bevis Schock, and move the court to grant the entry of appearance of William T. Woodrow for Plaintiffs, *pro hac vice* pursuant to Rule 9.03. In support whereof Plaintiffs state:

1. W. Bevis Schock, a licensed attorney in the State of Missouri, filed this case.
2. Plaintiffs now seek the admission of William T. Woodrow as additional counsel for Plaintiffs.
3. Mr. Woodrow is a member in good standing of the Bar of New York State.
4. He is a member of:

Stone & Woodrow LLP  
250 West Main St. Suite 201  
Charlottesville, VA 22902  
855-275-7378

5. No member of that firm is under suspension or disbarred by the highest court of any state or territory of the United States or the District of Columbia.
6. His attached affidavit, Exhibit A, lists every court of which he is a member of the bar.

7. As stated in that affidavit, Mr. Stone agrees to comply with Rules of Professional Conduct as set forth in Rule 4 and to become subject to discipline by the courts of this state.
8. Plaintiffs attach Exhibit A, a receipt from the Missouri Supreme Court for the \$410.00 fee.

WHEREFORE, Plaintiffs prays the court to admit William T. Woodrow, *pro hac vice*, to represent Plaintiffs in this matter.

Respectfully Submitted,

/s/ W. Bevis Schock.  
W. Bevis Schock, MBE # 32551  
Attorney for Plaintiffs  
7777 Bonhomme Ave., Ste. 1300  
St. Louis, MO 63105  
wbschock@schocklaw.com  
Fax: 314-721-1698  
Voice: 314-726-2322

So Ordered,

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Judge

Date \_\_\_\_\_